



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEM
OFFICE OF
WATER QUALITY

FEB 13 2014

2014 FEB 18 A 10:44

REPLY TO THE ATTENTION OF:

WN-16J

Paul Higginbotham, Chief
Permits Branch
Office of Water Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Re: U.S. Environmental Protection Agency Review of NPDES Permit, Once Through
Noncontact Cooling Water General Permit, Permit No. ING250000

Dear Mr. Higginbotham:

The U.S. Environmental Protection Agency has reviewed the pre-public notice draft National Pollutant Discharge Elimination System Permit (Permit), fact sheet, and supporting documents for the Once Through Noncontact Cooling Water General Permit submitted to EPA on April 27, 2012, and subsequently revised and resubmitted on October 26, 2012, July 10, 2013, December 6, 2013, and February 6, 2014. Based on our review to date, EPA would not object to issuance of the permit. However, our position could change if the following occurs.

- a. Prior to the actual date of issuance of a Proposed Permit, an effluent guideline or standard is promulgated which is applicable to the permit and which would require revision or modification of a limitation or condition set forth in the Draft Permit;
- b. A variance is granted and the Permit is modified to incorporate the results of that variance;
- c. There are additional revisions to be incorporated into the Permit which have not been agreed to by EPA; or
- d. EPA learns of new information, including as the result of public comment, that causes EPA to reconsider its position.

Subject to the above conditions, the permit may be issued in accordance with the Memorandum of Agreement and pursuant to the Clean Water Act. Although we currently do not intend to object, EPA recommends that you consider and address the comments identified in Enclosure A in order to improve the clarity and accuracy of the permit.

Enclosure A

U.S. Environmental Protection Agency
Once Through Noncontact Cooling Water General Permit
Permit No. ING250000

Although we currently do not intend to object, EPA recommends that you consider and address the comments identified in Enclosure A in order to improve the clarity and accuracy of the permit.

- The general permits state that water treatment additives will be approved under the existing state process and will be authorized in the notice of coverage. This would not be consistent with federal requirements. IDEM has agreed to include the currently authorized WTAs in the permit with any applicable limits.
- IDEM has agreed to develop an electronic version of draft NOI that will include a check list of eligibility requirements.